

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

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Kathryn KNOWLTON et. al.,

Plaintiffs,

v.

Case No. 20 CV 01660

CITY OF WAUWATOSA et. al,

Defendants.

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**PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT**

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NOW COMES the Plaintiffs, by their attorney, Kimberley Cy. Motley, respectfully move the Court, the Honorable Nancy Joseph presiding, for an order granting Plaintiffs' Motion for Partial Summary Judgment as to Claims 2 and 14. Summary judgment is appropriate when the movant shows that there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. Fed. R. Civ. P. 56(a); see also *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 248 (1986); *Celotex Corp. v. Catrett*, 477 U.S. 317, 324 (1986). "Material facts" are those under the applicable substantive law that "might affect the outcome of the suit." See *Anderson*, 477 U.S. at 248.

This Motion is based upon the pleadings, the Plaintiffs' Brief in Support of Summary Judgment, the Parties' Joint Statement of Facts, Plaintiffs Statement of Facts in Support of Summary Judgment, and the Declarations (and exhibits attached thereto). Through this Motion, the Plaintiffs also seek the costs and disbursements of this Motion and action.

Respectfully submitted this 19<sup>th</sup> day of December, 2022.

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